

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: James H. Edwards, III	:	
Debtor	:	CHAPTER 13
	:	
	:	BANKRUPTCY NO. 19-14211 MDC
	:	
	:	
Federal National Mortgage Association,	:	
("Fannie Mae"), its successors and assigns	:	
Movant,	:	
v.	:	
James H. Edwards, III	:	
William C. Miller, Trustee	:	
Respondents	:	

**DEBTOR'S RESPONSE TO THE MOTION OF  
FEDERAL NATIONAL MORTGAGE ASSOCIATION ("FANNIE MAE"),  
IT SUCCESSORS AND ASSIGNS FOR RELIEF FROM THE AUTOMATIC  
STAY**

1. Admitted

2-12. Denied. These averments consist of legal conclusions to which the applicable Rules of Civil Procedure do not require a response. To the extent not a legal conclusion, it is specifically denied that Debtor owes this much money. Strict proof is demanded at time of hearing, if relevant.

WHEREFORE, Debtor, by and through the undersigned counsel, does hereby pray that this Honorable Court dismiss Movant's Motion for Relief from Bankruptcy with prejudice.

Respectfully Submitted,

Jensen Bagnato, P.C.

By: Erik B. Jensen, Esquire  
Erik B. Jensen, Esquire

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**CERTIFICATE OF SERVICE**

I, Erik B. Jensen, esquire do hereby certify that a true and correct copy of the Debtor's Response to Motion for Relief was served upon the Chapter 13 Standing Trustee, William C. Miller, Esquire and Lorraine Gazzara Doyle, Esquire via electronic mail on November 7, 2019.

Date: 11-7-19

Respectfully submitted.

/S/ Erik B. Jensen  
Erik B. Jensen, Esq.